

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
v. : Criminal No. 13-  
CAROLYN JACKSON and : 18 U.S.C. § 13  
JOHN E. JACKSON : 18 U.S.C. § 113(a)(3)  
: 18 U.S.C. § 113(a)(6)  
: 18 U.S.C. § 2  
:

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,  
sitting at Newark, charges:

COUNT 1

(Conspiracy to Endanger the Welfare of a Child)

1. At all times relevant to this Indictment:

a. CAROLYN JACKSON and JOHN E. JACKSON were the  
biological parents of three children (together, "the Jackson  
biological children"):

i. J.J. (hereinafter, "J.J.#1"), who was born on

██████████;

ii. C.J. (hereinafter, "C.J.#1"), who was born on

██████████; and

iii. C.J. (hereinafter, "C.J.#2"), who was born on

██████████.

a. CAROLYN JACKSON and JOHN E. JACKSON were the foster/adoptive parents of three children (together, "the Jackson foster/adoptive children"):

i. J.J., a/k/a "J.K." (hereinafter, "J.J.#2"), who was born on [REDACTED] and died on or about May 8, 2008;

ii. J.J., a/k/a "J.W." (hereinafter "J.J.#3"), who was born on [REDACTED]; and

iii. C.J., a/k/a "K.W." (hereinafter "C.J.#3"), who was born on [REDACTED].

b. On or about August 26, 2005, CAROLYN JACKSON and JOHN E. JACKSON took into foster care J.J.#2. As foster parents, CAROLYN JACKSON and JOHN E. JACKSON assumed responsibility for, and accepted a legal duty to care for, J.J.#2.

c. On or about September 26, 2006, CAROLYN JACKSON and JOHN E. JACKSON adopted J.J.#2 and continued to assume responsibility for, and accept a legal duty to care for, J.J.#2.

d. On or about June 18, 2008, CAROLYN JACKSON and JOHN E. JACKSON took into foster care J.J.#3 and C.J.#3. As foster parents, CAROLYN JACKSON and JOHN E. JACKSON assumed responsibility for, and accepted a legal duty to care for, J.J.#3 and C.J.#3.

e. On or about July 23, 2009, CAROLYN JACKSON and JOHN E. JACKSON adopted J.J.#3 and C.J.#3, and continued to assume responsibility for, and accept a legal duty to care for, J.J.#3 and C.J.#3.

#### The Conspiracy

2. From in or around August 2005 through on or about April 23, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

for the purpose of promoting and facilitating conduct which endangered the welfare of a child, did agree with each other to engage in acts which constituted endangering the welfare of a child whom they had assumed responsibility for and accepted a legal duty to care for, namely, J.J.#2, J.J.#3, and C.J.#3, contrary to N.J.S.A. Section 2C:24-4a.

#### Methods and Means of the Conspiracy

3. Among the methods and means employed by the defendants to carry out the conspiracy were the following:

a. The defendants agreed with each other that they would employ disciplinary and child-rearing techniques that were neglectful and cruel on the Jackson foster/adoptive children.



b. The defendants physically assaulted the Jackson biological children and the Jackson foster/adoptive children with various objects;

c. The defendants caused J.J.#2 and C.J.#3 to sustain fractured bones;

d. The defendants failed to seek prompt medical attention for injuries and serious medical conditions sustained by J.J.#2 and C.J.#3;

e. The defendants withheld proper medical care for the Jackson foster/adoptive children;

f. The defendants withheld sufficient nourishment and food from J.J.#2 and C.J.#3;

g. The defendants withheld adequate water from J.J.#3 and C.J.#3, and at times, prohibited them from drinking water;

h. The defendants punished J.J.#3 when they caught J.J.#3 sneaking or attempting to sneak food and/or water;

i. After depriving J.J.#3 of water, the defendants required C.J.#2 to watch over J.J.#3 to prevent J.J.#3 from drinking out of sinks and toilet bowls;

j. The defendants forced J.J.#3 and C.J.#3 to consume food that caused them pain and suffering, such as red pepper flakes, hot sauce, and/or raw onion;

k. The defendants caused C.J.#3 to ingest excessive sodium or sodium-laden substances;

l. The defendants inflicted emotional cruelty upon the Jackson foster/adoptive children;

m. The defendants told the Jackson biological children, in substance and in part, that they were "training" the Jackson foster/adoptive children to behave through a variety of methods, including physical assaults and the administration of inappropriate, neglectful, and cruel disciplinary techniques;

n. The defendants instructed the Jackson biological children, in substance and in part, that they should not report the physical assaults to others and that the physical assaults were justified;

o. After JOHN E. JACKSON was informed by a family friend, in substance and in part, that J.J.#1 had confided in him/her about the physical abuse that was occurring in the Jackson household, JOHN E. JACKSON reported the same to CAROLYN JACKSON, who then retaliated against J.J.#1 by beating J.J.#1 multiple times with a belt; and

p. The defendants misled medical professionals, law enforcement officers, U.S. Army officials, and child protective services officials in Oklahoma, New Jersey, and Indiana through a variety of methods, including by:

i. failing to reveal the methods they used to discipline the Jackson foster/adoptive children;

ii. failing to reveal that they forced J.J.#3 and C.J.#3 to consume food that caused them pain;

iii. failing to provide accurate medical histories for the Jackson foster/adoptive children;

iv. misrepresenting the medical histories of J.J.#2 and C.J.#3;

v. failing to report the true causes and origins of the physical injuries and medical conditions that the Jackson foster/adoptive children sustained;

vi. misrepresenting the causes and origins of physical injuries and medical conditions sustained by the Jackson foster/adoptive children; and

vii. falsely claiming that C.J.#3's biological mother was the source of C.J.#3's injuries.

In violation of Title 18, United States Code, Section 13, and N.J.S.A. Section 2C:5-2.



COUNT 2

(Endangering the Welfare of a Child)

From in or about March 2006 through on or about May 8, 2008, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of J.J.#2, born [REDACTED] knowingly caused harm to J.J.#2 by withholding sufficient nourishment and food from J.J.#2, and made J.J.#2 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

COUNT 3

(Endangering the Welfare of a Child)

From on or about May 15, 2006 through on or about May 8, 2008, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of J.J.#2, born [REDACTED], knowingly caused harm to J.J.#2, by physically assaulting J.J.#2 with various objects, and made J.J.#2 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.



COUNT 4

(Endangering the Welfare of a Child)

From on or about [REDACTED] through on or about March 24, 2008, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of J.J.#2, born [REDACTED], knowingly caused harm to J.J.#2 by withholding prompt and proper medical care for J.J.#2's skin infection, and made J.J.#2 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

COUNT 5

(Endangering the Welfare of a Child)

From on or about June 18, 2008 through on or about April 16, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of J.J.#3, born [REDACTED], knowingly caused harm to J.J.#3 by withholding adequate water from J.J.#3 and prohibiting J.J.#3 from drinking water, and made J.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

COUNT 6

(Endangering the Welfare of a Child)

From on or about June 18, 2008 through on or about April 16, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of J.J.#3, born [REDACTED], knowingly caused harm to J.J.#3 by forcing J.J.#3 to ingest hot sauce, red pepper flakes, and raw onion, and made J.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.



COUNT 7

(Endangering the Welfare of a Child)

From on or about June 18, 2008 through on or about April 16, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of J.J.#3, born [REDACTED], knowingly caused harm to J.J.#3 by physically assaulting J.J.#3 with various objects, and made J.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

COUNT 8

(Assault)

On a date between on or about April 10, 2010 through on or about April 16, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

with intent to do bodily harm, assaulted J.J.#3 with a dangerous weapon.

In violation of Title 18, United States Code, Sections 113(a)(3) and 2.

COUNT 9

(Endangering the Welfare of a Child)

From on or about June 18, 2008 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of C.J.#3, born [REDACTED], knowingly caused harm to C.J.#3 by withholding sufficient nourishment and food from C.J.#3, and made C.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.



COUNT 10

(Endangering the Welfare of a Child)

From on or about June 18, 2008 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of C.J.#3, born [REDACTED], knowingly caused harm to C.J.#3 by withholding adequate water from C.J.#3 and prohibiting C.J.#3 from drinking water, and made C.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

COUNT 11

(Endangering the Welfare of a Child)

From on or about June 18, 2008 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of C.J.#3, born [REDACTED], knowingly caused harm to C.J.#3 by forcing C.J.#3 to ingest hot sauce and red pepper flakes, and made C.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

COUNT 12

(Endangering the Welfare of a Child)

From on or about April 10, 2010 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of C.J.#3, born [REDACTED], knowingly caused harm to C.J.#3 by causing C.J.#3 to ingest excessive sodium and a sodium-laden substance while restricting C.J.#3's fluid intake, causing C.J.#3 to suffer hypernatremia and dehydration, a life-threatening condition, and made C.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.



COUNT 13

(Endangering the Welfare of a Child)

From on or about April 10, 2010 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of C.J.#3, born [REDACTED], knowingly caused harm to C.J.#3 by withholding prompt and proper medical care for C.J.#3's dehydration and elevated sodium levels, and made C.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

COUNT 14

(Endangering the Welfare of a Child)

From on or about June 18, 2008 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of C.J.#3, born [REDACTED], knowingly caused harm to C.J.#3 by physically assaulting C.J.#3 with various objects, and made C.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

COUNT 15

(Assault)

On a date between on or about April 10, 2010 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

with intent to do bodily harm assaulted C.J.#3 with a dangerous weapon.

In violation of Title 18, United States Code, Sections 113(a)(3) and 2.



COUNT 16

(Assault)

On a date between on or about April 10, 2010 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey and elsewhere, the defendants,

CAROLYN JACKSON and  
JOHN E. JACKSON,

intentionally assaulted C.J.#3, resulting in serious bodily injury.

In violation of Title 18, United States Code, Sections 113(a)(6) and 2.

COUNT 17

(Endangering the Welfare of a Child)

From in or about March 2010 through on or about April 15, 2010, within the special maritime and territorial jurisdiction of the United States, at Picatinny Arsenal Installation, in Morris County, in the District of New Jersey, and elsewhere, the defendants,


CAROLYN JACKSON and  
JOHN E. JACKSON,

having a legal duty for the care of and having assumed responsibility for the care of C.J.#3, born [REDACTED], knowingly caused harm to C.J.#3 by withholding prompt and proper medical care for C.J.#3's fractured humerus, and made C.J.#3 a neglected child, and a child upon whom cruelty has been inflicted, as defined in N.J.S.A. Sections 9:6-1 and 9:6-3.

In violation of Title 18, United States Code, Sections 13 and 2, and N.J.S.A. Section 2C:24-4a.

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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**United States District Court  
District of New Jersey**

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UNITED STATES OF AMERICA

v.

CAROLYN JACKSON and  
JOHN E. JACKSON

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**INDICTMENT FOR**

18 U.S.C. § 13

18 U.S.C. § 113 (a) (3)

18 U.S.C. § 113 (a) (6)

18 U.S.C. § 2

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A True Bill,

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Foreperson

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PAUL J. FISHMAN  
UNITED STATES ATTORNEY  
NEWARK, NEW JERSEY

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